

EXHIBIT D

Renee Spence <spence@loevy.com>

Parks v. BPD - Request to Inspect

Shneur Nathan <snathan@nklawllp.com>

Wed, Jan 22, 2020 at 5:17 PM

To: Renee Spence <spence@loevy.com>Cc: Alexa Ackerman <alexa.ackerman@baltimorecity.gov>, Amanda Alcala <amanda@nklawllp.com>, Andrew Garden <andrew@loevy.com>, Avi Kamionski <akamionski@nklawllp.com>, Chris Wallace <chris@nklawllp.com>, Gayle Horn <gayle@loevy.com>, Jennifer Alcala <jalcala@nklawllp.com>, Jon Loevy <jon@loevy.com>, Justin Brown <brown@cjbrownlaw.com>, Justin Conroy <justin.conroy@baltimorecity.gov>, Kara Lynch <kara.lynch@baltimorecity.gov>, Katherine Roche <katie@loevy.com>, Lauren Lebata <lauren@loevy.com>, Lylian Romero <romero@cjbrownlaw.com>, Mayer Engelsberg <mengelsberg@nklawllp.com>, Natalie Amato <natalie.amato@baltimorecity.gov>, Theresa Concepcion <tconcepcion@nklawllp.com>

Spence,

Are you available to meet and confer regarding this request on Monday afternoon between 1 and 3? My initial impression is that this appears unduly burdensome in light of the fact that these documents were already produced. Assuming plaintiff demonstrates a real need for this inspection, it will still be helpful to discuss the particulars of the inspection. Thanks.

Shneur

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